# Index to Volume 14

## Author Index


ALTAMURA, ANTHONY, AND DREYFUS, JAMES K., *Small Business Job Protection Act of 1996, Impact on Investors* ..... 167

ALTAMURA, ANTHONY; MORENO, MARGARITA M.; AND DREYFUS, JAMES K., *Proposals Would Allow Checking the Box, but Tax Shorts Against the Box* ..... 24

BELL, MICHAEL A., AND McCORMICK, HUGH T., *Recent Developments Create Concern for Split-Dollar Life Insurance* ..... 51

BRADAC, MARC R., AND SWITZER, JR., RALPH V., The Tax Issues of Investing in a Vacation Home ..... 20

BUSH, JOHN N., AND HASPEL, AHRON H., *Deciphering the Taxation of Credit Derivatives* ..... 33

CALVIN, JAMES N., *Avoiding Exceptions to Tax Deferral on In-Kind Security Transactions With Investor Partners.* ..... 3

CARLISLE, LINDA E., AND KAPLAN, JASON W., *Tax Court Finds a Related-Party Rule in Section 265(a)(2)* ..... 75

CARLISLE, LINDA E., AND LANNING, GEOFFREY B., *Taxation of Certain Cross-Border Derivatives Transactions* ..... 289

CRUMBLEY, D. LARRY, AND DANOS, JOSEPH R., *Federal Circuit Holds Depletion Gross Income Can Exceed Actual Gross Income* ... 264

DANOS, JOSEPH R., AND CRUMBLEY, D. LARRY, *Federal Circuit Holds Depletion Gross Income Can Exceed Actual Gross Income* ... 264

DELMORE, DAVID B., *Fund-of-Funds: Evolution and Tax Implications* 330

DREYFUS, JAMES K.; ALTAMURA, ANTHONY; AND MORENO, MARGARITA M., *Proposals Would Allow Checking the Box, but Tax Shorts Against the Box* ..... 24

DREYFUS, JAMES K., AND ALTAMURA, ANTHONY, *Small Business Job Protection Act of 1996, Impact on Investors* ..... 167

EBELING, KATHLEEN; PETRUZZI, CHRISTOPHER R.; AND FOOTE, PAUL S., *Profit-Motivated Tax Straddles With Equity Options* ..... 367

ELSTON, FRANK A., AND PETRUZZI, CHRISTOPHER R., *A Mathematical Analysis of Charitable Remainder Trusts* ..... 221

FICHTENBAUM, MARK, *The Forms of Equity Investments Produce Disparate Tax Effects* ..... 12

FOOTE, PAUL S.; PETRUZZI, CHRISTOPHER R.; AND EBELING, KATHLEEN, *Profit-Motivated Tax Straddles With Equity Options* . 367

GLASSMAN, ROBERT I.; HOROWITZ, HARRIS M.; AND McDONALD, LISA C., *Being a "Tax Smart" Fund Investor* ..... 242

GRACE, MICHAEL J., *Recent Cases and Rulings Clarify Activity Determination and Other Issues* ..... 43

HASPEL, AHRON H., AND BUSH, JOHN N., *Deciphering the Taxation of Credit Derivatives* ..... 33

HENRY, R. MICHAEL, *Regulations Provide Framework for Tax Treatment of Contingent Debt and Integrated Debt Instruments* ..... 199

HINEMAN, THOMAS G., *Applying the Uniform Capitalization Rules to Oil and Gas Properties* ..... 68

HOROWITZ, HARRIS M.; GLASSMAN, ROBERT I.; AND McDONALD, LISA C., *Being a "Tax Smart" Fund Investor* ..... 242

HORWOOD, RICHARD M., *Preserving Asset Value in Special Family Situations* ..... 342

KAPLAN, JASON W., AND CARLISLE, LINDA E., *Tax Court Finds a Related-Party Rule in Section 265(a)(2)* ..... 75

KESS, KENNETH M., *Investment Partnerships Receive Guidance From Final Regs on Distribution of Marketable Securities* ..... 380

KESS, KENNETH M., *Issuance of Final Regulations Under Section 351 Will Not Resurrect Exchange Funds* ..... 152

KOWALCZYK ,TAMARA K., AND ZIMMERMAN, JOHN C., *Nontaxable Exchanges of Insurance Contracts and Annuities Under Section 1035* ..... 307

KRAUTHAMER, NINA, *Tax Court Overturns Revenue Ruling 80-362 and Reaffirms* Aiken Industries *in* SDI/Netherlands ..... 282

KRAUTHAMER, NINA, *This Time Around, the Eighth Circuit Comes Down With a Reversal of* Brown ..... 61

LANNING, GEOFFREY B., AND CARLISLE, LINDA E., *Taxation of Certain Cross-Border Derivatives Transactions* ..... 289

LARKINS,ERNEST R., *Owners of S Corporations Can Secure FSC Benefits Using IRAs* ..... 91

LEUNG, CECILIA, AND RAZAEE, ZABIHOLLAH, *Interactions Between Financial and Tax Rules on Market Value Accounting* ..... 132

MACINTOSH, ANDREA R., AND RUBIN, BLAKE D., *Creative Tax Planning for the Disposition of Over-Leveraged Real Estate* ..... 179

McCORMICK, HUGH T., AND BELL, MICHAEL A., *Recent Developments Create Concern for Split-Dollar Life Insurance* ..... 51

McDONALD, LISA C.; HOROWITZ, HARRIS M.; AND GLASSMAN, ROBERT I., *Being a "Tax Smart" Fund Investor* ..... 242

MORAN, JOHN A., AND SHORT, ANDREW, *IFSC Offers U.S. Multinationals Opportunity for Tax-Wise International Expansion* ..... 118

MORENO, MARGARITA M.; ALTAMURA, ANTHONY; AND DREYFUS, JAMES K., *Proposals Would Allow Checking the Box, but Tax Shorts Against the Box* ..... 24

OLIVER, JOSEPH R, *SBA '96 Invites S Corporation Sales of Subdivided Real Estate* ..... 316

PETRUZZI, CHRISTOPHER R., AND ELSTON, FRANK A., *A Mathematical Analysis of Charitable Remainder Trusts* ..... 221

PETRUZZI, CHRISTOPHER R.; FOOTE, PAUL S.; AND EBELING, KATHLEEN, *Profit-Motivated Tax Straddles With Equity Options* . 367

RAZAEE, ZABIHOLLAH, AND LEUNG, CECILIA, *Interactions Between Financial and Tax Rules on Market Value Accounting* ..... 132

RUBIN, BLAKE D., AND MACINTOSH, ANDREA R., *Creative Tax Planning for the Disposition of Over-Leveraged Real Estate* ..... 179

SHORT, ANDREW, AND MORAN, JOHN A., *IFSC Offers U.S. Multinationals Opportunity for Tax-Wise International Expansion* ..... 118

STONE, SUSAN M., *Deferring the Ultimate Makeover: Estee Lauder's IPO Makes Capital Hill Look Twice at Short Sales Against the Box Tactic* ..... 356

SWITZER, JR..,RALPH V., AND BRADAC, MARC R.,*The Tax Issues of Investing in a Vacation Home* ..... 20

TOOLSON, RICHARD B., *Investor Interest in Tax-Deferred Variable Annuities Is Increasing as They Sometimes Make Economic Sense* .. 103

WILLENS, ROBERT, *Final Regulations Soften the Rules on Conversion Transactions* ..... 80

WILLIAMSON, JAMES E., *Municipal Bond and Other Interest Rates Could Be Seriously Affected by Potential Tax Law Changes* ..... 160

WILLIAMSON, JAMES E., AND WITTENBURG, G. E., *Give That IRA to Charity* ..... 277

WITTENBURG, G. E., AND WILLIAMSON, JAMES E., *Give That IRA to Charity* ..... 277

ZIMMERMAN, JOHN C., AND KOWALCZYK ,TAMARA K., *Nontaxable Exchanges of Insurance Contracts and Annuities Under Section 1035* ..... 307

## Subject Index

**Accounting Issues**

Deciphering the Taxation of Credit Derivatives, *John N. Bush and Ahron H. Haspel* ..... 33

Interactions Between Financial and Tax Rules on Market Value Accounting, *Cecilia Leung and Zabihollah Razaee* ..... 132

**Annuities**

Investor Interest in Tax-Deferred Variable Annuities Is Increasing as They Sometimes Make Economic Sense, *Richard B. Toolson* ... 103

**Commodities and Financial Futures**

Tax Court Finds a Related-Party Rule in Section 265(a)(2), *Linda E. Carlisle and Jason W. Kaplan* ..... 75

Taxation of Certain Cross-Border Derivatives Transactions, *Linda E. Carlisle and Geoffrey B. Lanning* ..... 289

Profit-Motivated Tax Straddles With Equity Options, *Christopher R.. Petruzzi, Paul S. Foote, and Kathleen Ebeling* ..... 367

**Corporate Finance Vehicles**

Final Regulations Soften the Rules on Conversion Transactions, *Robert Willens* ..... 80

**Debt Instruments**

Regulations Provide Framework for Tax Treatment of Contingent Debt and Integrated Debt Instruments, *R. Michael Henry* ..... 199

**Derivative Investments**

Deciphering the Taxation of Credit Derivatives, *John N. Bush and Ahron H. Haspel* ..... 33

**Entity Classification**

Proposals Would Allow Checking the Box, but Tax Shorts Against the Box, *Anthony Altamura, James K. Dreyfus, and Margarita M. Moreno* ..... 24

**Estate Planning and the Family**
Preserving Asset Value in Special Family Situations, *Richard M. Horwood* ..... 342

**Interest Rates**
Municipal Bond and Other Interest Rates Could Be Seriously Affected by Potential Tax Law Changes, *James E. Williamson* ..... 160

**International Matters**
IFSC Offers U.S. Multinationals Opportunity for Tax-Wise International Expansion, *John A. Moran and Andrew Short* ..... 118
Tax Court Overturns Revenue Ruling 80-362 and Reaffirms *Aiken Industries* in *SDI/Netherlands, Nina Krauthamer* ..... 282
This Time Around, the Eighth Circuit Comes Down With a Reversal of *Brown, Nina Krauthamer* ..... 61

**Investment Companies**
Investment Partnerships Receive Guidance From Final Regs on Distribution of Marketable Securities, *Kenneth M. Kess* ..... 380
Issuance of Final Regulations Under Section 351 Will Not Resurrect Exchange Funds, *Kenneth M. Kess* ..... 152

**Investment Vehicles**
A Mathematical Analysis of Charitable Remainder Trusts, *Christopher R. Petruzzi and Frank A. Elston* ..... 221
Being a "Tax Smart" Fund Investor, *Harris M. Horowitz, Robert I. Glassman, and Lisa C. McDonald* ..... 242
Fund-of-Funds: Evolution and Tax Implications, *David B. Delmore* 330

**Life Insurance Products**
Nontaxable Exchanges of Insurance Contracts and Annuities Under Section 1035, *John C. Zimmerman and Tamara K. Kowalczyk* ..... 307
Recent Developments Create Concern for Split-Dollar Life Insurance, *Hugh T. McCormick and Michael A. Bell* ..... 51

**Like-Kind Exchanges**
Avoiding Exceptions to Tax Deferral on In-Kind Security Transactions With Investor Partners, *James N. Calvin* ..... 3

**Oil and Gas Investments**
Applying the Uniform Capitalization Rules to Oil and Gas Properties, *Thomas G. Hineman* ..... 68
Federal Circuit Holds Depletion Gross Income Can Exceed Actual Gross Income, *Joseph R. Danos and D. Larry Crumbley* ..... 264

**Passive Activities**
Recent Cases and Rulings Clarify Activity Determination and Other Issues, *Michael J. Grace* ..... 43

**Real Estate Investments**

Creative Tax Planning for the Disposition of Over-Leveraged Real Estate, *Blake D. Rubin and Andrea R. Macintosh* ..... 179

**S Corporations**

Owners of S Corporations Can Secure FSC Benefits Using IRAs, *Ernest R. Larkins* ..... 91

SBA '96 Invites S Corporation Sales of Subdivided Real Estate, *Joseph R. Oliver* ..... 316

**Securities Investments**

Deferring the Ultimate Makeover: Estee Lauder's IPO Makes Capital Hill Look Twice at Short Sales Against the Box Tactic, *Susan M. Stone* ..... 356

The Forms of Equity Investments Produce Disparate Tax Effects, *Mark Fichtenbaum* ..... 12

**Small Business Job Protection Act of 1996**

Impact on Investors, *Anthony Altamura and James K. Dreyfus* ..... 167

**Tax-Exempts**

A Mathematical Analysis of Charitable Remainder Trusts, *Christopher R. Petruzzi and Frank A. Elston* ..... 221

Give That IRA to Charity, *G.E. Whittenburg and James E. Williamson* ..... 277

**Vacation Home Investment**

The Tax Issues of Investing in a Vacation Home, *Ralph V. Switzer, Jr. and Marc R. Bradac* ..... 20

**Washington View**

Give That IRA to Charity, *G. E. Whittenburg and James E. Williamson* ..... 277

Municipal Bond and Other Interest Rates Could Be Seriously Affected by Potential Tax Law Changes, *James E. Williamson* ..... 160

Proposals Would Allow Checking the Box, but Tax Shorts Against the Box, *Anthony Altamura, James K. Dreyfus, and Margarita M. Moreno* ..... 24